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US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

The United States Bankruptcy Court for the District of Delaware  
824 North Market Street, 3rd Floor, Wilmington, Delaware 19801

Honorable Craig T. Goldblatt

Re: Chapter 11 Case No. 24-11836 (CTG)  
In re AIO US, INC., et al.,

Subject: CREDITOR'S OBJECTION TO "DEBTORS' THIRD OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN (I) NO LIABILITY CLAIMS AND (II) OVERSTATED CLAIMS"  
Docket 1095, 05/27/25; Schedule 2

DEBTOR: Avon Products Inc.

DATE: 2 June 2025

CLAIMANT: Ronald C. Wolfe  
Claim Number 10045  
Proof of Claim Filed 12/12/2024

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OBJECTION:

The Debtors' Proposed Reduced Claim Amount is without any substantiation and clearly incorrect and inadequately low.

(1) Debtor has arbitrarily and without any demonstrated basis reduced the Claimant's Asserted Claim Amount from \$1,162,838.40 to \$718,628.00 (38.2% reduction) based on the unsubstantiated Gund assertion that "Debtors' books and records," show" the reduced amount is owed. This claim is made without any definition and quantification of what information and data these "books and records" contain and how this alleged information is relevant to the Debtors' Proposed Claim Reduction and how they show that the Claimant is owed only the proposed reduced amount.

(2) No explanation has been provided to the Claimant as to how this alleged information has been obtained, verified and used to calculate the proposed reduced Claim.

RELIEF REQUESTED: Debtors' proposed Claim Reduction being unjustified and unsubstantiated the "DEBTORS' THIRD OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN (I) NO LIABILITY CLAIMS AND (II) OVERSTATED CLAIM" should be disallowed and the original submitted claim amount allowed.

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